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IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

FILED HARRISBURG, PA

DONALD C. HUNTER, III

MAR 13 2002

Plaintiff,

MARY E. D'ANDREA, CLERK

v.

No. 1:CV-01-0854 (JUDGE KANE)

COLUMBIA PROPANE CORPORATION et al

:

Defendants

PLAINTIFF'S CONCURRED-IN MOTION FOR AN ENLARGEMENT OF TIME TO COMPLETE DISCOVERY

Pursuant to Fed.R.Civ.P. 6(b), Plaintiff, Donald C. Hunter, III, by and through his attorney, Nathan C. Pringle, Jr., respectfully requests an enlargement of time of thirty (30) days, to and including April 15, 2002, to complete discovery in this action, and in support thereof, sets forth the following:

- 1. Discovery is scheduled to be completed by March 15, 2002.
- 2. Additional time is needed for the Plaintiff to prepare for depositions and develop his case.

3/14/0.

Counsel for Defendants, Randi R. Serota, Esquire and
Vijay K. Mago, Esquire, have no objection to this request for an
enlargement, as indicated on the attached certificate of
concurrence.

Wherefore, the Plaintiff, Donald C. Hunter, III, respectfully requests an enlargement of time of thirty (30) days, to and including April 15, 2002, to complete discovery.

Respectfully Submitted,

Nathan C. Pringle, Jr.

Attorney I. D. Number 30142

3601 North Progress Avenue

Suite 200

Harrisburg, PA 17110

(717) 909-8520

Attorney for Plaintiff

March 12, 2002

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

DONALD C. HUNTER, III

:

Plaintiff,

__

v.

No. 1:CV-01-0854

(JUDGE KANE)

:

COLUMBIA PROPANE

CORPORATION et al

:

Defendants

CERTIFICATE OF CONCURRENCE

Nathan C. Pringle, Esquire, counsel for the Plaintiff, certified that on March 11, 2002, he spoke with Randi R. Serota, Esquire, and Vijay K. Mago, counsel for Defendants, regarding an enlargement of time to complete discovery.

Ms. Serota and Mr. Mago concurred in the request.

Respectfully Submitted

Nathan C. Pringle, Jr.

Attorney I. D. Number 30142 3601 North Progress Avenue

Suite 200

Harrisburg, PA 17110

(717) 909-8520

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CERTIFICATE OF SERVICE

I, Nathan C. Pringle, Jr., hereby certify that on March 12, 2002, I caused to be delivered by first class mail a copy of the foregoing document entitled Plaintiff's Concurred-In Motion for an Enlargement of Time To Complete Discovery, upon the following:

Randi R. Serota, Esquire Duane Morris, LLP One Liberty Place 1650 Market Street Philadelphia 19103-7396

Vijay K. Mago, Esquire LeClair Ryan, P.C. 707 E. Main Street 11th Floor Richmond, VA 23219

Nathan C. Pringle, Jr.